

# **EXHIBIT 5**

Katy McDonald

May 07, 2025

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

\_\_\_\_\_  
IN RE: UBER )  
TECHNOLOGIES, INC., )  
PASSENGER SEXUAL ASSAULT )  
LITIGATION ) Case No.  
\_\_\_\_\_  
 ) 3:23-md-03084 CRB  
This Order Relates To: )  
 )  
ALL ACTIONS )  
\_\_\_\_\_

DEPOSITION OF KATY MCDONALD

CONDUCTED REMOTELY

MAY 7, 2025

REPORTED BY KAYLEE G. WOOD, RPR, CRR, CSR NO. 14348

Katy McDonald

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1 everybody's beautiful faces. I'm trying to remove all  
2 of the --

3 THE VIDEOGRAPHER: Okay. So if you hover  
4 over your screen, you should see the word view on the  
5 top right.

6 MS. POLLOCK: Yes.

7 THE VIDEOGRAPHER: If you click that, if you  
8 have it in speaker view --

9 MS. POLLOCK: There we go. Thank you.

10 THE VIDEOGRAPHER: Okay. No problem.

11 KATY MCDONALD,

12 having first been duly sworn, was examined and  
13 testified as follows:

14 EXAMINATION BY COUNSEL FOR THE MDL PLAINTIFFS  
15 BY MS. POLLOCK:

16 Q. Good afternoon. Could you please introduce  
17 yourself to the jury?

18 A. My name is Katy McDonald.

19 Q. Are you currently employed by Uber?

20 A. Yes.

21 Q. What is your current job title?

22 A. I am a director of data science.

23 Q. And you started working at Uber back in 2014,  
24 right?

25 A. That's correct, yes.

1       paragraphs down, the paragraph beginning: Thus, my  
2       solution. Could you read that, please, for the jury  
3       and then the content of paragraph number 1?

4           A. Yes. Thus, my solution to our safety problem  
5       requires two separate approaches. Number one, safety  
6       for riders. Run a deep analysis on known  
7       partner-drivers who have made Uber unsafe, i.e., gotten  
8       in major accidents, been accused of assault/rape,  
9       robbed riders. What are the trends/patterns between  
10      these drivers? Can we predict their behavior and  
11      proactively deactivate these partners?

12          Q. All right. So we -- it was on your mind back  
13       in 2014 at this time that it could be possible to look  
14       at the trends and patterns amongst drivers to see if  
15       one could predict their behavior?

16          A. I have --

17            MR. COX: Object to the form.

18            Go ahead.

19          A. I have always been passionate about safety,  
20       and so while I don't recall this specific proposal, I'm  
21       not surprised that my proposals around safety and  
22       finding creative ways to connect data with improving  
23       the safety of the platform for both riders and drivers.

24          Q. And you proposed this concept in 2014 to  
25       folks at Uber, correct?

1 and reliable data.

2 Q. When riders feel good about safety, Uber felt  
3 and you also felt that it would provide more business  
4 to Uber, is that right?

5 MR. COX: Object to the form.

6 A. I am confused by the question. Can you  
7 repeat it, please?

8 Q. Let's take a look at Exhibit 725, please,  
9 which is folder 11. Might have some clarity for you.

10 MR. COX: 11?

11 (Whereupon, Exhibit 725, Slack  
12 Correspondence, was marked for identification.)

13 Q. Are you ready, Ms. McDonald?

14 A. Yes.

15 Q. All right. Do you recognize Exhibit 725 as a  
16 communication exchange between yourself and Catherine  
17 Gibbons on what's called a Slack channel dated  
18 October 2, 2020?

19 A. Yes. I see it as a Slack exchange between  
20 Catherine and myself in October of 2020.

21 Q. All right. And a Slack exchange means that  
22 you and Ms. Gibbons were able to direct message each  
23 other, correct?

24 A. That's correct.

25 Q. Similar to -- for folks on the jury that may

1 not know what Slack is, similar to texting each other.

2 Do you agree with that?

3 MR. COX: Object to the form.

4 A. Yes. It's a messaging app, application.

5 Q. All right. Thank you. And so if you start  
6 at, just to orient ourselves, the first page of the  
7 document, you're reaching out to her and asking her for  
8 help with a Jira ticket, is that right?

9 A. Yes. I see that.

10 Q. All right. And you ask a question about why  
11 is contact 4 and contact 3 considered too vague,  
12 correct?

13 A. I see that as written, yes.

14 Q. All right. And then if we go back -- two,  
15 three, four. If we go back five pages to the Bates  
16 number ending in 6134 on the bottom, are you with me?

17 A. Yes.

18 Q. All right. Can you read what you've written  
19 here on this page starting from the top, please?

20 A. I see: I'm also on a path to educate that  
21 riders are the worst, and when we think about rider  
22 safety, what we really need to wrap our head around are  
23 we're just making the majority of riders feel good, and  
24 that's fine. We need them to feel good so that they  
25 give us business.

1 Q. All right. And you are referring -- the  
2 specific example, subject of this communication, about  
3 a dispatch model in Latin America. But there were also  
4 dispatch models under evaluation and being studied in  
5 the United States as well, true?

6 MR. COX: Object to the form.

7 A. I don't know. I'm not as familiar with that.  
8 I don't know.

9 Q. You don't know one way or the other?

10 MR. COX: Object to the form.

11 A. My understanding from my work at Uber is the  
12 safety issues that I'm highlighting here are rather  
13 unique to Latin America, at least from when I was  
14 involved in the work. So I don't know if there was any  
15 sort of discussion or work done for using this safe  
16 dispatch model elsewhere outside of Latin America.

17 Q. What was your role in balancing the safety  
18 needs with the marketplace growth business needs?

19 MR. COX: Object to the form.

20 A. Can you clarify the question?

21 Q. Well, I'm referring to your precise words  
22 where you say: We really have to balance safety with  
23 the marketplace growth business.

24 And my question is, what was your role with  
25 respect to this balancing act?

1 MR. COX: Object to the form.

2 A. I was not responsible for safe dispatch  
3 model. I believe I'm saying we here as in Uber,  
4 likely. I did not actually have any involvement in the  
5 creation of safe dispatch model. Again, I believe this  
6 is at the time when Julia was onboarding to Uber, and  
7 so it appears to me that this conversation is about me  
8 explaining how different things at Uber work to her.

9 Q. The page prior you are identifying to her  
10 several factors, risk factors, so you have a  
11 fundamental understanding of this concept, true?

12 MR. COX: Object to the form.

13 A. Can you clarify what concept you're referring  
14 to here?

15 Q. The idea of the safe dispatch, the subject of  
16 your communication with her.

17 A. Yes. That's why I'm explaining it to her. I  
18 have an understanding, a general understanding of the  
19 safe dispatch model. I worked in 2017 on the risk team  
20 and was familiar with similar safety issues at that  
21 time.

22 Q. And were you also familiar with similar  
23 safety issues in the United States?

24 A. No. My work was very exclusively in Latin  
25 America and parts of EMEA such as South Africa.

1 Q. But we know though at least as of 2021 Uber  
2 had developed a safe dispatch model for a country other  
3 than the United States, true?

4 A. Yes. There was a safe dispatch model that as  
5 mentioned here was very focused on mitigating the risk  
6 that came with cash in particular as an anonymous  
7 payment option which was more largely available in  
8 Latin America.

9 Q. I'd like to move off of this communication  
10 and direct your attention to communication -- first  
11 I'll ask is, who is the gentleman named Todd Gaddis?

12 MS. POLLOCK: We can take this exhibit down,  
13 please.

14 A. He's a data science manager at Uber.

15 Q. Is he your direct report?

16 A. No.

17 Q. Are you his direct report?

18 A. No.

19 Q. All right. Are you on the same team?

20 A. Excuse me? Yes. We're on the wider -- same  
21 data science team.

22 Q. All right. And there were times that you  
23 communicated with him via Slack, true?

24 A. Yes, over the course of my time I've  
25 discussed and engaged with Todd, yes.

Katy McDonald

May 07, 2025

## 1 : : : CERTIFICATE OF REPORTER : : :

2

3 I, Kaylee G. Wood, a Certified Shorthand  
4 Reporter, holding a valid and current license issued by  
the State of California, No. 14348, duly authorized to  
administer oaths, do hereby certify:5 That the witness in the foregoing deposition  
was administered an oath to testify to the whole truth  
in the within-entitled cause;6 That said deposition was taking down by me in  
shorthand at the time and place therein stated and  
thereafter transcribed into typewriting, by computer,  
under my direction and supervision.

7 ( X ) Reading and signing was requested.

8 ( ) Reading and signing was waived.

9 ( ) Reading and signing was not requested.

10 Should the signature of the witness not be  
affixed to the deposition, the witness shall not have  
availed himself/herself of the opportunity to sign or  
the signature has been waived.11 I further certify that I am neither counsel  
for nor related to any party in the foregoing  
depositions and caption named nor in any way interested  
in the outcome thereof.

12

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14 Dated: This 8th of May, 2025.

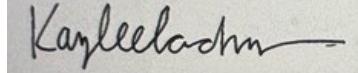
15

at San Diego, California.

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KAYLEE G. WOOD

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CSR NO. 14348

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